

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JACQUELINE BEEBE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

V&J NATIONAL ENTERPRISES, LLC,
V&J UNITED ENTERPRISES, LLC, V&J
EMPLOYMENT SERVICES, INC., and
V&J HOLDING COMPANIES, INC.,

Defendants.

Case No. 6:17-cv-06075-EAW-MWP

Class / Collective Action

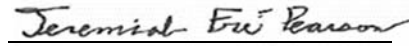
**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR
ATTORNEYS' FEES AND SERVICE AWARD**

PLEASE TAKE NOTICE that, upon the Declaration of Jeremiah Frei-Pearson, sworn on the 13th day of May, 2020, and the exhibits annexed thereto, as well as the Declaration of Jennifer M. Keough, sworn on the 13th Day of May, 2020, upon all the prior pleadings and proceedings had herein, and the accompanying Memorandum of Law, Plaintiff Jacqueline Beebe, individually and on behalf of all others similarly situated, and by and through her undersigned attorneys, Finkelstein, Blankinship, Frei-Pearson & Garber, LLP and with the consent of Defendants V&J National Enterprises, LLC, V&J United Enterprises, LLC, V&J Employment Services, Inc., and V&J Holding Companies, Inc., will bring a motion before this Court, on the 27th day of May 2020, respectfully moving this Court to grant the attorneys' fees and service award requested.

Dated: May 13, 2020

Respectfully submitted,

By:



Jeremiah Frei-Pearson

Andrew C. White

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*Attorneys for Plaintiff
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